

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re

Jenny Naranjo

Debtor

**Case No. 17-40776-nhl  
CHAPTER 13**

**JUDGE LORD**

**OBJECTION TO ENTRY  
OF DISMISSAL ORDER**

David J. Doyaga, Sr., of Doyaga & Schaefer, an attorney duly admitted to practice law in the State of New York does hereby affirm under penalty of perjury as follows:

1. That I am the attorney for Jenny Naranjo (the “Debtor”) and am fully familiar with all the facts and circumstances herein.
2. This affirmation is submitted as an objection to entry of a Dismissal Order on this Case.
3. The Debtor filed a voluntary Petition for relief pursuant to Chapter 13 of the Code under Case number 17-40776-nhl on February 22, 2017.
4. The adjourned date of the Motion to Dismiss was set for June 14, 2017 at 9:30 AM. The Debtor had a family emergency and had to go to Ecuador and was not able to tender her payments to the Marianne DeRosa, the Chapter Trustee or attend the Motion to Dismiss.
5. I appeared at the hearing on June 14, 2017 on behalf of the Debtor.
6. The Debtor has brought to my office a money order in the amount of \$6,000 with Debtor's counsel for the Trustee to bring herself current to June, 2017.

**WHEREFORE**, it is respectfully requested that the Dismissal Order not be entered and a hearing

scheduled on the Motion to Dismiss and Hearing on Confirmation.

Dated: Brooklyn, New York  
June 28, 2017

S/David J. Doyaga, Sr.  
David J. Doyaga, Sr.  
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